May 1, 2023

#### BY ECF

Hon. Analisa Torres
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

Re: In re: Search Warrants dated November 3 and 5, 2021,

Nos. 21 Misc. 813, 21 Misc. 819 and 21 Misc. 825 (AT)

Dear Judge Torres:

Pursuant to the Court's Order, dated February 18, 2022 ("Order"), I am submitting for the Court's review the March 2022 invoice setting forth the fees, expenses, and costs incurred by me and my firm in connection with my role as Special Master in the above-referenced matters.

I have shared this invoice with the parties prior to submittal and provided them an opportunity to object or ask questions. No objections were received. Accordingly, I respectfully request that the Court approve this invoice and direct the parties to pay the amount set forth therein in accordance with the Order.

As always, I am happy to answer any questions the Court may have or provide additional information if necessary.

Respectfully submitted,

/s/ Barbara S. Jones

Barbara S. Jones

Attachment

cc: Counsel for all parties

April 19, 2023

Invoice: 21955680

United States District Court, Southern District of New York (Veritas) 500 Pearl Street
New York, NY 10007

Our Matter: 0004730.000001 Special Master in Matters of Search Warrants regarding

**Project Veritas** 

For Services Through March 31, 2023

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/07/23	Draft/revise R&R.	4.20	3,780.00
03/08/23	Review privilege issues.	1.50	1,425.00
03/08/23	Research for R&R.	1.70	1,530.00
03/08/23	Attention to issues re order; conference with team	1.50	1,425.00
03/13/23	Research for R&R call with Judge Jones re: same.	0.50	450.00
03/15/23	Call with D. Shargel re: R&R.	0.20	180.00
03/15/23	Telephone conference re report and recommendation	0.40	380.00
03/16/23	Draft/revise R&R.	1.80	1,620.00
03/17/23	Final review and approval of R&R	1.00	950.00
03/17/23	Draft/edit R&R call with D. Shargel re: lists and R&R.	1.20	1,080.00
03/17/23	Review report and recommendation; telephone conference with R Maxwell	1.00	950.00
03/18/23	Finalize lists of released and withheld documents	5.30	5,035.00
03/20/23	Review and cite check Report and Recommendation o Special Master	8.50	5,100.00
03/20/23	Edits to R&R charts.	0.60	540.00

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<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/20/23	Extensive work on organizing and finalizing decisions on documents and report	5.70	5,415.00
03/21/23	Edits to R&R charts.	0.20	180.00
03/21/23	Finalize and file report and recommendation	1.80	1,710.00
03/22/23	Attention to issues re redaction and follow up	0.80	760.00
03/24/23	Attention to redactions; correspondence with parties	1.30	1,235.00
03/25/23	Review and confirm redactions; produce same to parties	1.00	950.00
Total Fees			\$ 34,695.00

#### **Expense Detail**

<u>Date</u>	Cost	<u>Description</u>	<u>Amount</u>
03/31/23	Other	Complete Discovery Source - Vendor: Complete Discovery Source - Monthly Data Housing, Monthly	8,673.19
		User License, Project Management Inv# INV-CDS-	
		31185 Date: 03/31/2023	

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Total Expenses \$ 8,673.19

Total Fees, Expenses and Charges on This Invoice \$43,368.19

Government's 50% share: \$21,684.10 Petitioners' 50% share: \$21,684.10

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